

THOMAS E. DOWEY, ESQUIRE  
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Attorney for  
Debtor

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UNITED STATES BANKRUPTCY COURT  
DISTRICT COURT OF NEW JERSEY

IN RE: Gina Frizzell  
Stanley G. Frizzell, Jr.

Case No. 10-31513 (GMB)  
Chapter 13

**NOTICE OF MOTION TO DETERMINE VALUE OF SECURITY AND CREDITOR'S  
ALLOWED CLAIM**

HEARING DATE: 09/07/2010

ORAL ARGUMENT REQUESTED X

TO: Isabel Balboa  
Cherry Tree Corporate Center  
535 Route 38, Suite 580  
Cherry Hill, New Jersey 08002

PNC Bank, N.A.  
Attn: Bankruptcy Dept  
P.O. Box 5570  
Cleveland, OH 44101-0570

PLEASE TAKE NOTICE that on the 7<sup>th</sup> day of September 2010 at 10 o'clock AM, the undersigned attorney for Debtor(s), Thomas E. Dowey, Esquire shall make application to this Honorable Court for an Order determining the value of the personal residence of the debtor at 178 Ardmore Road, Mays Landing, NJ 08330.

PLEASE TAKE FURTHER NOTICE the debtors will also move for an Order modifying any Proof of Claim filed by PNC Bank, N.A. for the second mortgage to fully unsecured.

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the attached Certification of the debtors, the arguments of counsel and such other and further proofs as may be adduced at the hearing hereof.

PLEASE TAKE FURTHER NOTICE that the moving party believes that no brief is

necessary in support of the within application due to the fact that the matter involves no complex issues of law or fact.

PLEASE TAKE FURTHER NOTICE that the undersigned hereby requests oral argument of this matter.

PLEASE TAKE FURTHER NOTICE that if you wish to contest the within Motion, you must file opposition with the office of the Clerk of the Bankruptcy Court, and serve the undersigned, 7 days in advance of the aforesaid hearing, your responding papers stating with particularity the basis of your opposition to the within Motion. A copy of the proposed Order which is sought is annexed hereto and made a part hereof.

/s/ThomasE.Dowey,Esq.  
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THOMAS E. DOWEY, ESQUIRE  
Attorney for Debtor

Dated: July 30, 2010